

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 21-CR-28

ASHTON HOWARD,

Defendant.

**GOVERNMENT'S UNOPPOSED MOTION FOR ENTRY OF
A PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, the United States of America, by Matthew Krueger, United States Attorney for the Eastern District of Wisconsin, and Benjamin Proctor, Assistant United States Attorney for said district, hereby respectfully moves for the entry of a protective order, and in support thereof states as follows:

1. The indictment in this case charges the defendant with one count of interference with a law enforcement officer during a civil disorder in violation of Title 18, United States Code, Section 231(a)(3), and one count of illegally possessing ammunition, in violation of Title 18, United States Code, Section 922(g)(1).

2. The discovery to be turned over to the defense includes, among other things, statements of the defendant, reports of the investigation, social media information, and phone data. This includes sensitive information from confidential sources and personal identifying information of witnesses. Unnecessary disclosure of

such information would adversely impact the privacy interests of third parties and present a serious safety risk to certain individuals involved. While the government will redact certain information, a discovery protective order is necessary to limit unnecessary disclosures.

3. Counsel for the government provided a copy of the proposed protective order to the defendant's counsel at the time of arraignment. On February 24, 2021, defense counsel responded that Mr. Howard has no objection to the proposed order governing discovery.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted this 24th day of February, 2021.

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